



Archerfield Airport Corporation

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Aviation Green Paper

Background

Metro Airports.

The Aviation Green Paper emphasises that a safe, efficient, sustainable, productive and competitive aviation sector is critical to the economy and the standard of living of all Australians, however the lack of any real discussion about the role of Metro Airports in the Paper causes concern that at a government level, there is little understanding of the significant importance and value of Metro Airports to the entire Australian aviation ecosystem.

This may possibly have been caused due to the high turnover of personnel in the Department during and post Covid, leading to a loss of knowledge of the corporate history of the important, but very different role that the Federally Leased Metro Airports play, compared to the other usually much larger RPT Federally Leased Airports, and the way Metro Airports were originally planned to be regulated post privatization.

This status is demonstrated by the fact that for the financial year 2022/2023, Air Services Australia data shows that the 6 Metro Airports of Parafield, Archerfield, Essendon, Moorabbin, Jandakot and Bankstown were responsible for generating over 40% of aircraft movements in Australian skies. However, this percentage is definitely higher, as the data was collected only during Tower opening times, but the airports operate 24 hours.

As the name implies, metro airports are located close to capital cities, yet they are not in competition with the capital city airports, but actually provide a supporting role by supplying alternative airport infrastructure for smaller aircraft, freeing up airspace, and airport facilities for the capitals to operate their main business of domestic and international schedule services in a much more efficient and cost-effective manner.

The importance of this support can not be over emphasised. Again, using FY 2022/23 Airservices data, Brisbane had 193,542 aircraft movements, but Archerfield had 213,352 (albeit much smaller) aircraft movements. Brisbane's airport infrastructure would be overwhelmed if Archerfield was not operating.

Metro's have been briefly mentioned in the context of being simple airport infrastructure to support pilot training, however this is not the case.

Metro's are complex aerodromes supporting a mix of general aviation, a fast growing corporate aviation sector, wide ranging aerial emergency services, significant civil helicopter operations and extensive aviation training from ab initio pilots through to full scale commercial licences, and now an increasing number of LAME's training facilities.

Recommendation

Metro Airports are an essential part of the Australian aviation ecosystem, providing significant economic and social benefits to their local area economy, the wider regional and remote economies, and operational support to the capital city airports.

Metro Airports should be recognised as such in the Green Paper

Regional and Remote Aviation Services

The Green Paper largely focuses on either RPT airline operations between the regions and larger cities, or the financial challenges of operating an airport in regional and remote areas.

It is silent on the fact that both now and in the future, metro airports support the regional and remote airports by acting as the bookend between the regions and the gateway to the capital city for the significant volume of non RPT flights, including emergency medical services, general aviation, corporate aviation and rotor.

This is particularly important when discussing funding, as currently the metro airports are falling between the proverbial funding cracks and are not eligible for any regional funding in spite of being essential part of regional and remote aviation.

Recommendation

The importance of the metro airports to regional and remote aviation is recognised, and metro airports become eligible for funding designed to improve services to the regions.

Emerging New Aviation Technology

Metro airports will be at the forefront of facilitating the introduction of the emerging technology between the capital cities and the regions.

The potential of these new technologies is immense, ranging from eVTOL aircraft to cargo UAV's, through to electrification of aircraft or the use of Hydrogen as a fuel.

Some of the metro's are already in discussion with providers of these technologies, but major input is still required from Government about specific regulatory management of this new industry particularly CASA and ASA. There has been a lot of talk and good will from the Government Agencies, but what is urgently required is a firm road map of how to turn talk into a practical, workable regulatory environment.

This new technology is already in existence. Cargo UAV's have already been approved by EASA and are now operating commercial flights. They are planning to bring the UAV to Australia for testing and approval mid-2024. eVTOL air taxis will be in commercial operation for the Paris Olympics, and their operators want to come to Australia as soon as possible.

Will CASA and Airservices Australia be ready? If not, Australia will lose a major opportunity.

The importance of Net Zero is recognised, however the main focus of the Government and the aviation industry is on SAF.

Many smaller airports including Metros are wanting to explore the introduction of electrification of aircraft or the introduction of Hydrogen as an aviation fuel, but the start-up costs are prohibitive.

Will there be any Government support to encourage this transition to green fuel?

Recommendation

The Government needs to provide the budget and resources to CASA and ASA to develop the regulatory and operational regime for the new technology, and then to be able to manage it alongside traditional aviation activities.

Fit for Purpose Agencies and Regulations

Airservices Australia have faced a severe shortage of controllers across Australia for two years. This has impacted the aviation industry in many ways.

Metro airports have had the number of training circuits significantly reduced, leading not only to a commercial impact on the training schools, but also a large increase in training flights in the early morning or late a night when the Tower is not open. This has significantly increased the number of noise complaints and caused bad will in the local community.

Recommendation

Air Services must be able to provide a workforce of controllers commiserate to the number of flights that they are supposed to control.

Regulatory Regime

The Metro's are the smaller (both in terms of physical size and commercial stature) of the Federal Leased Airports, and prior to privatisation often ran at a financial loss.

This was recognised with the original intent of privatisation, and that there was to be a concept of Core and Non-Core airports, with the smaller non-core airports being subject to a minimalistic lighter handed regulatory regime.

Over time, this concept has disappeared and all the Leased Airports are subject to a one size fits all regime. For the smaller airports this is adding complexity, cost and delay to our business.

This is most prevalent with the cost, time and effort required in obtaining Airport Building Controller (ABC) and Airport Environment Officer (AEO) approvals for new time projects. We are constantly being told by our contractors, how hard, more time consuming and therefore more expensive it is to get approvals on airport, compared with their State counterpart.

This is specifically not in accordance with the concept of competitive neutrality implied with in the Airport Act.

This increasing regulatory burden is a financial burden that has adverse impact on how we want to grow the business, and puts us at a significant commercial disadvantage to our competitors such as Wellcamp and Sunshine Coast Airports who are not subject to this regime.

Recommendation

Give the smaller airports the option to be regulated by the State for Environment and Building Control issues.

This will reduce the impact of excessive red and green tape on the smaller airports, and reduce the workload and save costs for the Commonwealth.